

# EXHIBIT B

**IN THE UNITED STATES DISTRICT COURT**

**FOR THE NORTHERN DISTRICT OF ILLINOIS (EASTERN DIVISION)**

TS Merchandising Ltd., a British Virgin Islands  
corporation, and TS Production LLC, a Hungarian  
limited liability company,

Case No. 07 C 6518

Plaintiffs,

**AFFIDAVIT OF DAN HOLLINGS**

vs.

(Assigned to the Hon. Ronald A. Guzman)

Dan and Loretta Hollings, Arizona residents, and  
Web Services, LLC, an Arizona limited liability  
company,

Defendants.

**AFFIDAVIT OF DAN HOLLINGS**

Personally appeared before me, the undersigned officer duly authorized to administer  
oaths in the State of Arizona, Dan Hollings, who, after first being sworn, deposes and says:

1.

I am over the age of twenty-one (21) years, of sound mind, and legally competent to give  
this testimony

2.

I have personal knowledge of the facts set forth in this affidavit.

3.

I am a resident of Arizona and have been since 1999.

4.

I do not own, use or possess any property in Illinois.

5.

I am not liable for income or property tax in Illinois.

6.

I do not maintain any bank accounts in Illinois.

7.

I do not maintain an office or telephone number in Illinois.

8.

I am not registered to vote in Illinois.

9.

The negotiations surrounding my work on The Secret website started in 2005.

10.

All of the negotiations and agreements surrounding the work that I performed on The Secret website were between me and Rhonda Byrne as well as her company Prime Time Products.

11.

Ms. Byrne represented that she was in the course of producing a movie called The Secret and solicited my help in setting up The Secret's website, orchestrating an internet marketing campaign and overseeing internet activities such as customer support, fulfillment and programming for The Secret's website.

12.

Our agreement is memorialized in a series of emails between me and Ms. Byrne. At all times during the negotiation of my work on The Secret I was in Arizona and Ms. Byrne was in either Australia or California.

13.

I performed all of my work associated with The Secret website from my home in Arizona.

14.

In late 2005, Ms. Byrne and/or Prime Time Products hired Bob Rainone to act as CEO for The Secret. Mr. Rainone's lives in Illinois. Following his retention as CEO, The Secret set up offices in Illinois.

15.

By the time The Secret had established offices Illinois, I had already been retained and I had already begun my work on The Secret website and internet project.

16.

I did not have a contractual relationship, nor was I engaged by The Secret. Rather, my work was negotiated with and performed for Rhonda Byrne and Prime Time Products.

17.

After Mr. Rainone was hired, he instructed me to submit my monthly invoices for my work to The Secret at its offices in Illinois, which I did per his instructions.

18.

I never initiated any working relationship with Mr. Rainone or any employees of The Secret's Illinois office. The fact that I corresponded and sent invoices to Illinois was due to the unilateral decision of Ms. Byrne and Prime Time Products to retain an Illinois company. Pursuant to their instructions, I was required to participate in emails, telephone calls and to direct invoices to Illinois.

19.

I have never visited The Secret's Illinois office.

20.

Approximately one month prior to my termination from The Secret, LLC, I was required to attend a one-day meeting at the Chicago O'Hare International Airport in Chicago, Illinois. Bob Rainone, the Chief Executive Officer of The Secret, LLC, was present at this meeting. This meeting was the only occasion in which I traveled to Illinois for anything associated with The Secret.

21.

Other than the meeting discussed in ¶ 12, I have not traveled to Illinois for business or personal reasons within the past six (6) years.

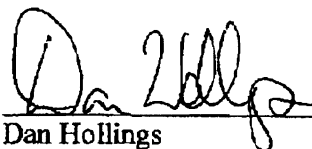
22.

I designed the draft webpage known as [www.know-more-secrets.com](http://www.know-more-secrets.com) from my home in Arizona, after my tenure with Ms. Byrne and her company.

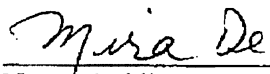
23.

Any URLs, domain names or website addresses which I have registered have been registered from my home in Arizona.

FURTHER AFFIANT SAYETH NOT.

  
Dan Hollings

SWORN TO AND SUBSCRIBED  
before me this 5<sup>th</sup> day  
of February, 2008.

  
Notary Public  
My Commission Expires:

